

EXHIBIT A

State of Illinois)
) ss
County of St. Clair)

**UNSWORN DECLARATION UNDER PENALTY OF PERJURY
IN SUPPORT OF COMPLAINT FOR FORFEITURE**

I, Molly Emmerich, do hereby depose and declare under penalty of perjury the following:

At all times relevant herein, I have been a United States Postal Inspector with the Chicago Division, St. Louis Field Office of the U.S. Postal Inspection Service. The contents of this Declaration are based on information provided to me during the course of my investigation from participants in the criminal activity, from other witnesses, and from other law enforcement officers as well as the review of documents and records obtained during the investigation.

1. In April 2016, an investigation was opened against Michael Davenport, Susan Quinn, Cynthia Rawlinson and Juan Martinez, collectively doing business as American Standard Online, Housing Standard LLC, Anchor House Financial, MDSQ Productions LLC and possibly other companies (collectively referred to herein as “Anchor House”).

2. The investigation has focused on allegations that, since 2009, these individuals have conspired with each other and additional persons to defraud consumers by selling an online database of houses purportedly in preforeclosure status that were available for purchase or rent-to-own.

3. Anchor House markets and sells an online database of houses that are purportedly in “preforeclosure” and can be purchased at favorable prices. This investigation was initiated from a review of consumer complaints about Anchor House contained in Consumer Sentinel. Consumer Sentinel is a national database of consumer complaints maintained by the Federal

Trade Commission (FTC). Complaints are entered online by consumers, by consumer protection regulators and by law enforcement. Rick Copelan, President/CEO of the Better Business Bureau (BBB), serving Ventura, Santa Barbara and San Luis Obispo Counties in California, provided consumer complaints to the USPIS.

4. There are approximately 850 total complaints in Consumer Sentinel and the BBB that reference the Anchor House companies, including American Standard Online, Housing Standard LLC, and Anchor House Financial. In their complaints, many of the consumers said that they responded to advertisements on the Craigslist website for houses that were available for sale or rent. When the consumers called the number listed on the advertisements, their calls were answered by Anchor House salespersons. Usually, the salespersons told the consumers that the houses they were interested in were no longer available. The salespersons then told the consumers that Anchor House had information relating to similar houses that were available in the area the consumers were interested in. In order to obtain the information relating to these houses, however, the consumers would have to purchase Anchor House's online database of available houses. The salesperson stated that the price of the database was a \$199 one-time refundable fee. In return for this \$199 fee, the salespersons told the consumers that they would receive access to a nationwide database of preforeclosure listings, Anchor House customer support, title searches, deed transfers, and other legal documents.

5. Many of the consumers reported that the Anchor House database they purchased was worthless. After the consumers purchased the database, they typically reviewed it and identified houses they were interested in. The consumers then either attempted to contact the homeowners directly, or via U.S. Mail as instructed by Anchor House. When they did this, in the majority of cases, the consumers found out that the homes were not available for sale. On other

occasions, the consumers discovered that the houses and addresses contained in the Anchor House database did not even exist.

6. Several of the consumer complaints indicated that Anchor House uses the United States mails in furtherance of this scheme. For example, some of the complaints stated that Anchor House requires its customers to mail form letters to homeowners regarding houses the customers are interested in purchasing. Other complaints state that Anchor House refused to pay refunds unless the customers mailed to Anchor House a certain number of rejection letters received back from the homeowners. In fact, in one BBB complaint, a victim with the initials "J.P." wrote, in part,

American Standards Online is an unscrupulous scam. It took me 3 months of sending out letters with self-addressed stamped envelopes to over 300 homeowners in my area to get 5 people to respond. I finally got my 5 letters of denial and submitted them with the certified letter. I was not contacted by American Standards. I waited and waited for my refund, and then finally started calling. After 3 unsuccessful attempts at reaching a live human, I finally got through to someone today (40 days after having sent in my request for a refund) and I was told that NONE of my five letters of denial could be verified and therefore I would NOT be issued a refund. I was shocked and furious when I heard this after going through so much trouble and expense to adhere to their ridiculous refund requirements. There was no mention of "verification" in the fine print, and they refused to show me the results of their verification process.

7. The investigation has revealed that the owners and operators of Anchor House do not use the business's physical location for its mailing addresses. Instead, for purposes of receiving mail from consumers, Anchor House utilizes private mail boxes at commercial mail receiving agencies ("CMRAs"), including the UPS Store. In my experience, businesses engaged in consumer fraud often attempt to hide their physical location by using boxes at CMRAs for purposes of receiving mail from consumers.

8. The U.S. Postal Inspection Service obtained telephone records from Bandwidth.com for the toll free numbers provided on the websites of American Standard Online,

Housing Standard LLC, and Anchor House Financial. The business address for the customer to which 44 toll free numbers are assigned is MDSQ Productions LLC, 401 N Milpas Street, Santa Barbara, CA 93103. In my experience, businesses engaged in consumer fraud often obtain multiple toll free numbers to continue operating when consumers post complaints online to warn others to avoid the business with that number.

9. The U.S. Postal Inspection Service contacted the Santa Barbara County District Attorney's Office ("Santa Barbara DA's Office"). Representatives of the Santa Barbara DA's Office stated that they also have an open criminal investigation of Anchor House and its employees. Specifically, the Santa Barbara DA's Office's stated that they were investigating possible violations of California Penal Code § 182 (conspiracy to cheat and defraud, inter alia) and § 487 (grand theft).

10. On April 12, 2016, U. S. Postal Inspector L. Latham, acting in an undercover capacity using the alias name of "Alan Kale," placed a recorded call to 877-395-1287 to the Anchor House contact number provided on the anchorhousefinancial.com website. U.S. Postal Inspector Latham placed this call from the Fairview Heights, Illinois, Office of the Postal Inspection Service in the Southern District of Illinois.

11. During his initial call, Inspector Latham stated that he was interested in purchasing the online database, but he had some questions. The person who answered the phone responded that all their representatives were busy, but she would have someone call him back.

12. A short time later, an Anchor House employee who identified herself as "Cynthia" called Inspector Latham. This conversation was recorded. Inspector Latham asked Cynthia about Anchor House and their online database. Cynthia described Anchor House as a "listing agency" that has been in business for over ten years. Cynthia stated that the company

“lists” for private homeowners who are in preforeclosure. Cynthia also told Inspector Latham that the houses are “easy to get into” because the homeowners are desperate. Cynthia explained that Inspector Latham would be taking over the payments on a homeowner’s existing loan. Cynthia further told Inspector Latham that Anchor House would “do everything” to help him purchase a house, including doing title searches and deed transfers.

13. Cynthia asked Inspector Latham what area of the country he was located in and Inspector Latham responded that he was in the St. Louis metropolitan area. Cynthia then stated that Anchor House had 200 listings in the St. Louis area. Inspector Latham replied that he was specifically interested in houses in the southern Illinois towns of Edwardsville, Collinsville, and Belleville. Edwardsville and Collinsville are located in Madison County, Illinois. Belleville is located in St. Clair County, Illinois. Cynthia told Inspector Latham that Anchor House had several good listings in those towns and surrounding communities.

14. Cynthia told Inspector Latham that the fee was \$199. Cynthia then added that this fee “covers everything,” including access to the listings, title searches, deed transfers, and any necessary legal documents.

15. Cynthia also told Inspector Latham that the \$199 was refundable. In order to get a refund, however, Inspector Latham would have to “use the program” for 90 days and view at least five of the houses listed. Cynthia further told Inspector Latham that he would have to have the homeowners from the houses he viewed sign a form to prove that he had actually viewed the houses. Cynthia advised Inspector Latham to take this form with him when he went to look at the listings.

16. Inspector Latham asked Cynthia what she meant when she said that the houses on the listing were in “preforeclosure.” Cynthia responded that this meant that the houses were not

yet in foreclosure, but that the homeowners were behind on their mortgage payments. According to Cynthia, Anchor House learned this information either from the lenders or from the homeowners themselves. She then stated that the whole purpose of “the program” was to allow the customers to take over the homeowners’ loans before they went into foreclosure.

17. Inspector Latham then asked Cynthia where Anchor House gets its listings. Cynthia responded that Anchor House gets most of its listings from lenders it works with. Cynthia added that some of the listings come directly from the homeowners. She added, however, that all of the houses listed were available for either purchase or “rent-to-own.”

18. Inspector Latham asked about Anchor House’s success rate. Cynthia responded that the program really works good in certain areas. She added that in areas such as the one Inspector Latham was inquiring about, he would be “100% good to go” and with the number of listings in that area, Inspector Latham would be “just fine.”

19. On April 13, 2016, Inspector Latham placed a recorded call to 805-708-3082 to Cynthia’s “direct number” which was provided by Cynthia on April 12, 2016. Inspector Latham placed this call from the Fairview Heights, Illinois, Office of the Postal Inspection Service in the Southern District of Illinois. Cynthia answered the phone stated she was on the other line, but she would call him back.

20. Within the hour, Cynthia called Inspector Latham back from toll free number 877-395-1294. The conversation was recorded. Inspector Latham purchased access to Anchor House’s online database over the phone by providing Cynthia a prepaid debit MasterCard that he had bought at Wal-Mart. Cynthia advised Inspector Latham that Anchor House Customer Service would help him contact the homeowners and arrange walk-throughs.

21. On April 13, 2016, Inspector Latham received an email sent to his undercover

email account from Anchor House providing him a receipt, order ID, and account information, including: a login URL, a username and a password.

22. On or about April 14, 2016, U.S. Postal Inspection Service Fraud Analyst Marvin Koechig first accessed the Anchor House database with the login URL provided in the email from Anchor House. The initial webpage was a login page asking for username (email) and password. Once Koechig logged in the “member dashboard” page appeared. Below the member dashboard was “Visit the Search Listings page” with the following statement: “Our comprehensive database of listings and valuable tools for our members will help you take advantage of the opportunity to buy apartments, homes and commercial real estate for prices that are way below market value. Even if you’ve never made a home purchase in your life, our service makes it easy to find the best deals available anywhere in the country.” After Koechig clicked on the “Search Listings” box, a page opened titled “Resources/Search Listings.” This page contained a series of dropdown menus. The first dropdown box selected the state. After the state was selected, an additional drop down menu allowed the user to either enter a county in that state or a zip code with 0-50 mile radius.

23. On April 19, 2016, Inspector Latham, acting in an undercover capacity, placed a recorded call to 877-395-1287 to the Anchor House Customer Support. Inspector Latham spoke with an unidentified female in Customer Support. Latham stated that he had driven by a couple of the houses in the Anchor House database and discovered that one was a vacant lot, and at another one the homeowner was working in the yard and didn’t know anything about his house being listed in the Anchor House database (Latham discovered the lot was vacant through the use of Google Maps but otherwise did not contact any homeowners). The Customer Support employee attempted to explain away the fact that the homeowner said he didn’t know his house

was in the database. The Anchor House employee claimed that it's embarrassing for the homeowners when customers approach them without an appointment. The Customer Support representative further stated, "If you do approach a homeowner in that way without an appointment what we almost always see is they're not going to be willing to talk about their finances." The Customer Support employee said the best way to approach a homeowner is to use the contact letter from the website. The Customer Support employee then stated that Anchor House would check into the status of the property with the vacant lot to see if something has possibly changed and not been updated. Fraud Analyst Marvin Koechig confirmed that as of September 14, 2016, the property with the vacant lot at 4 Highwood Circle, Belleville, Illinois had not been removed from or updated in the database. The database listed this property as a three-bedroom with one-bathroom house.

24. On May 17, 2016, the U.S. Postal Inspection Service, still acting in an undercover capacity, mailed 15 of the Anchor House contact letters to addresses of houses in the Southern District of Illinois that were listed in the Anchor House database. The contact letters were printed on Anchor House letterhead and contained the following language:

Dear Homeowner, First and foremost... I know that your home is so much more to you than an investment, and in this economy it has been tough for everyone. I'd like to indicate my interest in your property, and offer a solution. As a homeowner with a property in preforeclosure, you're certainly receiving multiple requests right now. Ultimately, my goal as an interested party is to give you the ability to maximize your options while minimizing the hassle you're dealing with today with your property. I am excited to work with you, and to move forward with a discussion of your options. Ready to move forward? Dial 1-877-395-1287. Mention my name & ID below. Sincerely, Anchor House Financial

25. The Anchor House contact letters, as instructed by the Anchor House Customer Support employee, were mailed addressed to "Homeowners" with a return address belonging to Alan Kale which was actually an undercover PO Box in Fairview Heights, Illinois controlled by

the U.S. Postal Inspection Service.

26. As of June 22, 2016, 9 out of the 15 letters were returned to the undercover PO Box. The following reasons for the returns were stamped on the envelopes: (1) five were stamped "No such number"; (2), two were stamped "Insufficient address"; (3) one was stamped "No mail receptacle"; and (4) one was stamped "Vacant."

27. On July 6, 2016, interviews were conducted of 3 of the 6 homeowners to whom the letters were sent but had not responded. One homeowner said her home has never been for sale since she purchased it in foreclosure in July 2015. This homeowner said she immediately threw away the mailing from Alan Kale without even opening it because the envelope was handwritten. A second homeowner said his father purchased the house in foreclosure in 2013. This second homeowner further stated that there was no mortgage against the property and he had no interest in selling or renting his house. The third homeowner acknowledged that she had some financial trouble in 2009 and that her property went into foreclosure status due to tax issues. She clarified, however, that her property has not been available for sale or rent since 2007. She planned to read the letter from Alan Kale later. After I read her a copy of the letter, she said she would have just thrown away the letter and not responded because she is not interested in selling or renting her property.

28. Inspector Latham and the Postal Inspection Service received no response to the remaining three letters. It appears that the homeowners at these addresses received these letters and simply ignored them.

29. On June 23, 2016, U. S. Postal Inspector Latham, still acting in an undercover capacity, placed a recorded call to Anchor House. Postal Inspector Latham placed this call from the Fairview Heights, Illinois, Office of the Postal Inspection Service. During this call, Inspector

Latham spoke with an individual in Anchor House's Customer Support Department. Inspector Latham informed the Customer Support representative that 9 out of the 15 letters had been returned. In response, the Customer Support representative offered to email to Inspector Latham a "custom search" of up to 10 specific listings of available properties. The Customer Support representative told Inspector Latham that these properties were not from the Anchor House online database. The representative further told Inspector Latham these properties would fit his monthly rental budget, counties of interest, and the type of property he was looking for.

30. On June 29, 2016, U.S. Postal Inspector Latham received an email sent to his undercover email account from Anchor House which was titled, "Alan Kale Custom Search." This email included an attachment with a list of 10 homes for sale within Latham's specified monthly budget and counties of interest. The ten properties were not included in the Anchor House site database.

31. On July 15, 2016, Fraud Analyst Marvin Koechig and I conducted an internet search on the 10 homes provided in the Anchor House custom search list. The following chart provides the addresses of the properties and the property status:

Address	City, State, Zip	Status	Source
IL Rt 140	Greenville, IL 62246	To be sold at Public Auction	Trulia.com
Cox Monument Ave	Pocahontas, IL 62275	Home has pending offer	Zillow.com
E Oak St	Greenville, IL 62246	For sale on market for 482 days	Zillow.com
Joshu Ct	Greenville, IL 62246	For sale on market for 51 days	Zillow.com
W Washington Ave	Greenville, IL 62246	Pending offer with photo of	Zillow.com
Kingsley Dr	Shiloh, IL 62269	7/6/16 pending sale 7/15/16	Zillow.com
Millikin Dr	Fairview Heights, IL	Pending sale 6/7/16	Zillow.com
Fallen Timber Ln	Mascoutah, IL 62258	Pending sale 6/29/16	Zillow.com
Union Hill Rd	Fairview Heights, IL	For sale on market for 83 days	Zillow.com
S Richland St	Freeburg, IL 62243	For sale on market for 104 days	Zillow.com

32. In August 2016, I spoke with four realtors representing homeowners and one daughter of a previous homeowner on the custom search list provided to Inspector Latham. The four realtors said the houses they listed were for sale but not in preforeclosure. The daughter of a previous homeowner told me her mom hired a ReMax realtor to list the property for sale in June

2016 for \$180,000. Since her mother recently moved into an assisted living facility the daughter retained the paperwork. The property sold within a week after it was first listed. During the 18 years her parents owned the property, it was never available for rent-to-own or in preforeclosure. Her parents never had any financial problems.

33. A review of the online database purchased by Inspector Latham from Anchor House revealed approximately 200 Santa Barbara County, California listings. On or about April 27, 2016, the Santa Barbara County District Attorney's Office investigated seven of the Santa Barbara County, California listings. One out of the seven houses was in foreclosure at the time the list was purchased. Four out of the other six properties were nonexistent addresses and two properties were not in foreclosure.

34. U.S. Postal Inspection Service employees selected a number of the properties listed in the Anchor House online database which are located in the Southern District of Illinois. Postal Inspection Service employees then investigated whether those properties were, in fact, available for sale. The database contained listings for 31 properties in Salem, in Marion County, Illinois. Fraud Analyst Marvin Koechig reviewed official Postal Service address records and was unable to locate 16 of the listed Salem, Illinois, properties. Koechig was also unable to locate those 16 addresses during an online review of Marion County property records. Koechig then contacted the Salem, Illinois, Police Department and asked for assistance in determining whether the 16 address in question existed. On May 26, 2016, Detective Bryan Green of the Salem Police Department informed Koechig that all of the 16 addresses had been checked and that none of them existed.

35. The Anchor House database also contained listings for approximately 160 properties located in St. Clair County, in the Southern District of Illinois. Fraud Analyst Koechig

travelled to the St. Clair County Recorder of Deeds office and obtained the parcel numbers for each of these properties. Koechig then accessed St. Clair County property records online and researched the title histories of each of these properties.

36. Fraud Analyst Koechig started his examination by looking at the database and finding the date that each property was entered into the database. Koechig then examined the St. Clair County property records for any activity which post-dated the listing dates. For 114 of the properties, Koechig found that the properties had been sold very near or after the dates that the listings were posted. These sales, however, occurred long before Inspector Latham purchased the database.

37. For 39 of the other St. Clair County properties, Fraud Analyst Koechig found that civil actions had been filed against the properties, indicating that the properties may have been in foreclosure at one time. For all 39 of the properties, however, the civil court cases had been closed or dismissed long before Inspector Latham purchased the database.

38. For the remaining 7 St. Clair County properties in the Anchor House database, Fraud Analyst Koechig found that 4 were duplicates of other listings. For the remaining 3, Koechig could find no parcel numbers for the properties in St. Clair County's records.

39. From April to July 2016, I interviewed 6 homeowners, 5 in St. Clair County, IL and 1 in Madison County, IL, all of whose properties were listed in the purchased Anchor House database. These individuals stated that they were not interested in selling their homes and had not listed them in any online databases.

40. The Anchor House Financial contact address provided on their website is 5662 Calle Real Suite #207, Goleta, CA 93117, which is the address of the UPS Store in Goleta, CA. The CMRA application submitted to the UPS Store for Box #207 lists the following names

for applicant mail: Michael Davenport, Anchor House, Housing Standard and MDSQ Productions LLC. The application also lists Michael Davenport, Susan Quinn and Juan Martinez as Corporate Officers located at 401 N Milpas Street, Suite D, Santa Barbara, CA 93103.

41. The American Standard Online contact address provided on their website is 1187 Coast Village Road, Suites #1-555, Montecito, CA 93108, which is the address of the UPS Store in Montecito, CA. The customer information on the CMRA application lists Kelly Taylor and Michael Davenport, with an address of 401 N Milpas Street, Suite E, Santa Barbara, CA 93103. In April 2016, Montecito UPS Store employee Saima (Last name unknown) confirmed that Michael Davenport picks up the mail for this box. Davenport provided a copy of his photo ID when the box was opened. Saima stated that the picture shown on this ID matches the individual that retrieves the mail.

42. The Housing Standard contact address provided on their website is 1072 Casitas Pass Road, Suite #106, Carpinteria, CA 93013, which is the address of the UPS Store in Carpinteria, CA. The name listed on the CMRA application is Michael Davenport.

43. The U.S. Postal Inspection Service obtained merchant processor records from TSYS Acquiring Solutions for the Anchor House companies. Merchant accounts are used for processing credit card payments and issuing chargebacks. Based upon my review of the records, it appears that payments made by consumers via credit cards to the Anchor House companies were deposited into these accounts. The address listed in TSYS's records for the Anchor House merchant account is 2260 Las Canoas Road in Santa Barbara. TSYS Acquiring Solutions records further show Anchor House had over 14.5 million dollars in total gross sales for the time period 2011 to June 2016.

Merchant Number	Merchant Legal Name	Merchant DBA	Account Opened	Current Status	Amount in Reserve	Owner of Account
3899000002056834	Housing Standard LLC	Housing Standard Com	11/4/2011	CLOSED – 09/22/16	\$179,096.06	Michael Davenport
3899000002743506	Housing Standard LLC	Anchor House Financial	12/04/2014	Currently Open	\$183,449.94	Michael Davenport
3899000002957601	Housing Standard LLC	Anchor House Financial	10/30/2015	Currently Open	\$109,891.64	Michael Davenport
3899000002348439	Housing Standard LLC	Housing Standard LLC	Application Denied 11/08/2013	N/A	N/A	Michael Davenport
3899000003109863	MDSQ Productions LLC	American Standard Online Com	05/17/2016	Currently Open	\$26,733.68	Susan Quinn
3899000001372141	MDSQ Productions LLC	American Standard Online Com	06/11/2010	Closed 05/03/16	\$316,466.76	Susan Quinn
3899000003071220	MDSQ Productions LLC	Your American Standard	03/28/2016	Currently Open	\$64,389.58	Susan Quinn

44. Other records obtained during the investigation also show that the Las Canoas Road property in Santa Barbara was used to conduct business on behalf of Anchor House. The CMRA application from the UPS Store in Carpinteria, CA lists Michael Davenport as the applicant and states that both Davenport's home and business addresses are Las Canoas Road, Santa Barbara, CA. Further, the Las Canoas Road address in Santa Barbara is listed as the business address for two Housing Standard, LLC business checking accounts at JP Morgan Chase.

45. On October 7, 2016, the United States District Court for the Southern District of Illinois issued a warrant ordering the seizure of any and all funds within Priority's custody, and owned by or being held on behalf of or under the names of Michael Davenport, Susan Quinn, American Standard Online, Housing Standard, LLC, Anchor House Financial, MDSQ Productions LLC, Housing Standard Com, American Standard Online Com, and Your American Standard (collectively, "the Anchor House companies").

46. At that time, Priority had in its possession approximately \$897,883.66 in funds on behalf of the Anchor House companies in a bank account held at BMO Harris Bank, which funds were being held in reserve for the purpose of mitigating against any present and future liabilities of the Anchor House companies, including, but not limited to, chargebacks made by the Merchants' customers or cardholders that dispute the validity of the sales transactions entered into with the Anchor House companies. A "chargeback" is the return of funds to a consumer, mainly used in the United States, forcibly initiated by the issuing bank of the instrument used by a consumer to settle a debt. Specifically, it is the reversal of a prior outbound transfer of funds from a consumer's bank account, line of credit, or credit card.

47. Priority requested, and the United States agreed, that Priority be allowed to temporarily retain custody of the Funds for purposes of paying chargeback requests submitted by customers of the Anchor House companies who believed they had been defrauded by the Anchor House companies. More specifically, the United States agreed that Priority may retain the funds for not more than 120 days from the service of the Seizure Warrant, which occurred on October 7, 2016, solely for the purpose of remitting the Funds to consumers seeking chargebacks or otherwise challenging the validity of transactions with the Anchor House companies.

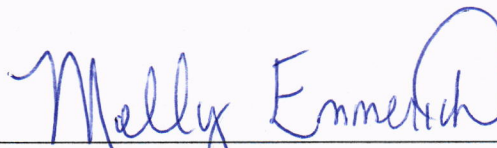
48. On February 22, 2017, the United States received \$853,210.11, which represents the remaining balance of the funds held by Priority Payment Systems on behalf of Michael Davenport, Susan Quinn, Cynthia Rawlinson and Juan Martinez, collectively doing business as American Standard Online, Housing Standard LLC, and Anchor House Financial, MDSQ Productions LLC.

49. Based on the forgoing, declarant believes that the subject-matter \$853,210.11 in United States Currency constitutes and/or is derived from proceeds traceable to violations of

Title 18, United States Code, Section 1341 (Mail Fraud), Title 18, United States Code, Section 1343 (Wire Fraud) and Title 18, United States Code, Section 1349 (Conspiracy to Commit Mail and Wire Fraud).

Pursuant to Title 28, United States Code, Section 1746(2), I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 7th day of March, 2017.


MOLLY EMMERICH
United States Postal Inspector
United States Postal Inspection Service